

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA**

EARL GAVIN,)	
)	CASE NO. : 7:18-cv-00523-AMQ-JDA
Plaintiff,)	
)	
v.)	DEFENDANT EQUIFAX INC.'S
EXPERIAN INFORMATION SOLUTIONS)	RESPONSES TO LOCAL RULE 26.03
INC., et al.)	INTERROGATORIES
)	
Defendants.)	

COME NOW Defendant Equifax Inc. (referred to herein as “Equifax”), and hereby files its responses to Local Civil Rule 26.03 Interrogatories:

(1) A short statement of the facts of the case.

Response: Equifax Inc. is the parent company of Equifax Information Services LLC (“EIS”). Equifax Inc. is not a consumer reporting agency and did not issue any consumer reports concerning Plaintiff in this case. Equifax Inc. is not a proper party in this matter. Equifax Inc. denies that it is liable to Plaintiff in this matter.

(2) The names of fact witnesses likely to be called by the party and a brief summary of his expected testimony.

Response: (a) Earl Gavin. Plaintiff has knowledge of his claims, alleged damages, and the events and circumstances giving rise to this lawsuit.

(b) Designated representative of Equifax Inc. This person will testify to the facts that Equifax Inc. does not maintain any consumer credit file for any individual, and that Equifax Inc. has never issued a consumer report regarding Plaintiff.

(c) Any family members or friends of Plaintiff who may have knowledge of factual basis of all claims and defenses.

Equifax Inc. reserves the right to call any and all individuals or entities identified by Plaintiff in his Initial Disclosures, Witness List, discovery responses, or any supplements to

same.

(3) The names and subject matter of expert.

Response: At this time, Equifax Inc. does not anticipate using expert witnesses. Equifax Inc. reserves the right to modify this response and to name an expert in rebuttal to any named by Plaintiff.

(4) A summary of the claims or defenses with statutory and/or case citations supporting the same.

Response: Equifax Inc. is not a consumer reporting agency and did not issue any consumer reports concerning Plaintiff. Therefore, it is not liable for any claims under the FCRA.

(5) Absent special instructions from the assigned judge, the parties shall propose dates for the following deadlines listed in Local Civil Rule 16.02:

- (a) Exchange of Fed. R. Civ. P. 26(a)(2) expert disclosures; and
- (b) Completion of discovery.

Response: See Rule 26 Outline of Discovery Plan filed by the parties.

(6) The parties shall inform the Court whether there are any special circumstances which would affect the time frames applied in preparing the scheduling order. See generally Local Civil Rule 16.02(C) (Content of Scheduling Order).

Response: None.

(7) The parties shall provide any additional information requested in the Pre-Scheduling Order (Local Civil Rule 16.01) or otherwise requested by the assigned judge.

Response: None.

Respectfully submitted this 3rd day of May, 2018.

/s/ Rita Bolt Barker
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